**To:** Kyra Moore[kyra.moore@dnr.mo.gov]

Cc: Bybee, Darcy[darcy.bybee@dnr.mo.gov]; Amy Algoe-Eakin[Algoe-Eakin.Amy@epa.gov];

Peter, David[peter.david@epa.gov]; Jonathan Meyer[Meyer.Jonathan@epa.gov]

From: Jay, Michael

**Sent:** Mon 3/7/2016 6:04:01 PM

Subject: Labadie Site Specific Study/Beta Options

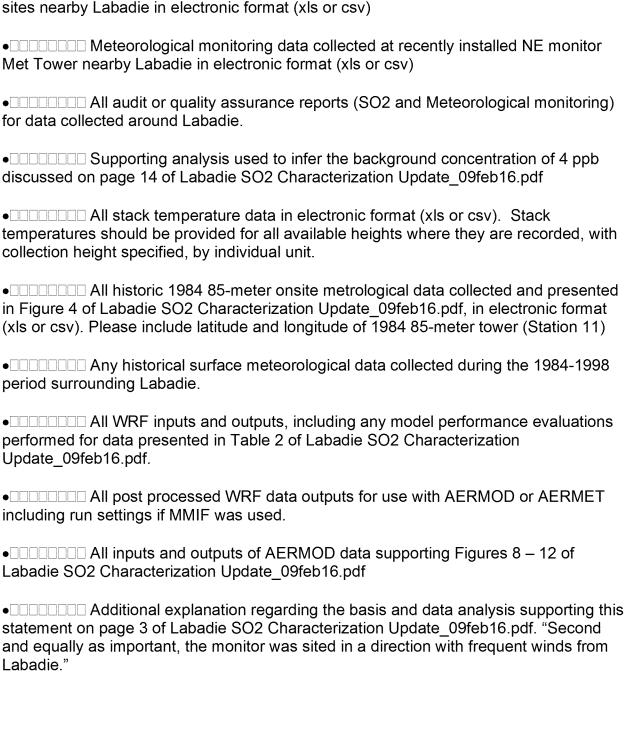
Kyra,

Over the past several weeks, we have received several communications from both MDNR and Ameren related to technical analyses and characterizations of Labadie Energy Center for the 2010 1-hour SO2 NAAQS. On December 9, 2015, the Missouri Department of Natural Resources transmitted to EPA a request from Ameren that EPA consider an alternative model demonstration in support of 1-hr SO2 NAAQS designation for the area around Ameren's Labadie Energy Center. On February 17, 2016, Mr. Steve Whitworth, Senior Director of Environmental policy and Analysis at Ameren, provided additional information to MDNR and copied EPA. This information related to the dispersion modeling approach for Labadie and is requested to be supplemental information to the December 9, 2015 communications. On February 24, 2016, Mr. Steve Whitworth provided to EPA, via email, a request for two items. First, he requested to meet with EPA Region 7 technical staff to discuss the December 9, 2015 request for consideration of the use for an alternative model demonstration, and second, he requested that EPA Region 7, so as to assure complete transparency, submit the material and request for a case by case approval to the Modeling Clearinghouse for review and approval as soon as possible in like of the pending designation decision.

In response to the December 9, 2015 MDNR request and as outlined in the Technical Support Document for the Missouri Area Designations for the 2010 SO2 Primary National Ambient Air Quality Standard, EPA Region 7 has evaluated the submitted proposal, and has determined that the analysis provided by MDNR does not meet the requirements in accordance with the current Appendix W for the use of LOWWIND3 beta option at this time. We consulted with the Model Clearinghouse on this determination.

In regards to the February 17 and 24, 2016 communications, EPA acknowledges this email and recognizes Ameren's request. However, in order to appropriately evaluate the materials submitted, review consistently with the EPA's Model Clearinghouse procedures, and proceed as Ameren's request, EPA requests the following information from Ameren in order to consider their request:

• \ SO2 monitoring data collected at recently installed NW and NE monitors



If you would like to discuss our review of your request, please feel free to contact me directly at (913) 551-7460 or contact Amy Algoe-Eakin at (913) 551-7942.

## Mike Jay

Branch Chief

Air Planning and Development Branch

USEPA R7

913-551-7460